

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	X	
	:	Chapter 11
	:	
In re:	:	Case No. 22-11068 (JTD)
	:	
FTX TRADING LTD., <i>et al.</i> , <sup>1</sup>	:	(Jointly Administered)
	:	
Debtors.	:	<b>Re. D.I. 27755</b>
	:	
	:	
	X	

**THE JOINT LIQUIDATORS OF THREE ARROWS CAPITAL, LTD. (IN  
LIQUIDATION)’S WITNESS AND EXHIBIT LIST FOR HEARING ON  
DECEMBER 12, 2024 AT 1:00 P.M. (PREVAILING EASTERN TIME)**

Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized joint liquidators (the “**Joint Liquidators**”) appointed in the British Virgin Islands’ (“**BVI**”) liquidation of Three Arrows Capital, Ltd. (in liquidation) (the “**3AC Debtor**”) and foreign representatives of the 3AC Debtor, as recognized pursuant to chapter 15 of the Bankruptcy Code in the case captioned *In re Three Arrows Capital, Ltd.*, Case No. 22-10920 (MG) (Bankr. S.D.N.Y. 2022), hereby submits this witness and exhibit list (this “**Witness & Exhibit List**”) in connection with the hearing scheduled for **December 12, 2024 at 1:00 p.m. (prevailing Eastern Time)** before the Honorable John T. Dorsey, at the United States Bankruptcy Court for the District of Delaware (the “**Hearing**”), at which time the *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim* [D.I. 27755] (the “**Motion to Amend**”), is currently scheduled to be heard.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these chapter 11 cases, a complete list of FTX debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of FTX’s claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**WITNESSES**

The Joint Liquidators of the 3AC Debtor may call the following witnesses at the hearing:

Name and Address	Synopsis of Anticipated Testimony
<p>Russell Crumpler c/o Latham &amp; Watkins LLP 1271 Avenue of the Americas New York, NY 10020</p>	<p>Mr. Crumpler will offer testimony regarding the Joint Liquidators' efforts to obtain information concerning the 3AC Debtor's relationship with FTX and potential claims and subsequent analysis, including but not limited to the subjects identified in the <i>Declaration of Russell Crumpler in Support of the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in liquidation) for Leave to Amend Proof of Claim</i> (the "<b><u>Crumpler Declaration</u></b>"), attached as Exhibit B to the Motion to Amend.</p> <p>The Joint Liquidators of the 3AC Debtor may call Mr. Crumpler as a custodian of the business records of the Joint Liquidators of the 3AC Debtor to authenticate such business records, if necessary.</p> <p>The Joint Liquidators of the 3AC Debtor may elicit additional direct or rebuttal testimony from the witness at the Hearing.</p>
<p>Adam J. Goldberg Latham &amp; Watkins LLP 1271 Avenue of the Americas New York, NY 10020</p>	<p>Mr. Goldberg's testimony authenticating certain documents submitted in support of the Motion to Amend was submitted through the <i>Declaration of Adam J. Goldberg in Support of the Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim</i> (the "<b><u>Goldberg Declaration</u></b>"), attached as Exhibit C to the Motion to Amend.</p> <p>The Joint Liquidators of the 3AC Debtor may elicit additional direct or rebuttal testimony from the witness at the Hearing.</p> <p>The Joint Liquidators of the 3AC Debtor do not anticipate that any party will request to cross examine the witness.</p>
<p>Christian Fay c/o Latham &amp; Watkins LLP 1271 Avenue of the Americas</p>	<p>Mr. Fay will offer testimony regarding the Joint Liquidators' ability to download data from the FTX website.</p>

<b>Name and Address</b>	<b>Synopsis of Anticipated Testimony</b>
New York, NY 10020	
Any witness called by FTX	

The Joint Liquidators of the 3AC Debtor reserve the right to supplement this witness list and to cross-examine any witness called by any other party. The Joint Liquidators of the 3AC Debtor also reserve the right to call any witness, including any rebuttal witness, identified in any other party's witness list.

### **EXHIBITS**

The Joint Liquidators of the 3AC Debtor incorporate by reference any of the exhibits listed by FTX in its exhibit list for the Hearing. The Joint Liquidators of the 3AC Debtor reserve their right to object to the entry into evidence of any exhibit. The Joint Liquidators of the 3AC Debtor also reserve their right to amend, shorten, or supplement this witness and exhibit list prior to the Hearing.

In addition, the Joint Liquidators of the 3AC Debtor designates the following exhibits that may be used at the Hearing in connection with the Motion:

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>D.I.</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
1.	2023.06.29 3AC Debtor's Original Proof of Claim	N/A				
2.	2024.09.19 Transcript of the 30(b)(6) Deposition of Robert Gordon (with errata sheet) (full)	N/A				
3.	2024.11.06 Joint Liquidators' Motion to Amend Proof of Claim	27755				
4.	2024.11.06 Declaration of Russell Crumpler In Support of The Motion of The Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim	27755, Ex. B				

EXHIBIT NO.	DESCRIPTION	D.I.	OFFERED	OBJECTION	ADMITTED	DATE
5.	2024.11.06 Declaration of Adam Goldberg In Support of The Motion of The Joint Liquidators of Three Arrows Capital, Ltd. (In Liquidation) for Leave to Amend Proof of Claim	27755, Ex. C				
6.	2024.06.05 Limited Objection and Reservation of Rights of the Foreign Representatives of Three Arrows Capital, Ltd.'s (in Liquidation) to the FTX Debtors' Motion for Entry of an Order Approving the Adequacy of the Disclosure Statement	16817				
7.	2024.11.20 Motion of Debtors for Entry of An Order Establishing The Amount of The Disputed Claims Reserve	28102				
8.	2020.11.26 Article titled "Introducing Spot Margin Trading on FTX" (undated)	N/A				
9.	2021.04.28 FTX Line of Credit (FTX_3AC_00013664-69)	N/A				
10.	2021.10.22 Loan and Security Agreement (FTX_3AC_000000075-95)	N/A				
11.	2022.03.30 FTX Line of Credit (FTX_3AC_0000000758-63)	N/A				
12.	2022.05.13 FTX Terms of Service (FTX_3AC_000013695-756)	N/A				
13.	2022.06.14 Slack Short Message Report (FTX_3AC_000001594-96)	N/A				
14.	2022.06.16 Slack Short Message Report (FTX_3AC_000000350-357)	N/A				
15.	2022.06.17 Email between FTX and the 3AC Debtor (FTX_3AC_000013568-69)	N/A				
16.	2022.06.27 Letter from Crumpler to Walmisley (3AC-FTX-00532278-86)	N/A				
17.	2022.06.28 Email from Crumpler to Davies and Zhu regarding liquidation (3AC-FTX-00533021-33)	N/A				

EXHIBIT NO.	DESCRIPTION	D.I.	OFFERED	OBJECTION	ADMITTED	DATE
18.	2022.06.29 Slack Short Message Report (FTX_3AC_00001394-403)	N/A				
19.	2022.07.01 Email from Fay to Davies regarding liquidation (3AC-FTX-00532361-79)	N/A				
20.	2022.07.01 Email from Nathan Bickley-May to FTX re “Three Arrows Capital Ltd – In Liquidation   Letter to FTX US” (3AC-FTX-00527050-61)	N/A				
21.	2022.07.05 Email from Crumpler to Zhu regarding liquidation (3AC-FTX-00532399-417)	N/A				
22.	2022.07.05 Email from Crumpler to Davies (3AC-FTX-00532380-98)	N/A				
23.	2022.07.07 Email from Fay to Farmer regarding 3AC accounts with FTX (3AC-FTX-00526791-94)	N/A				
24.	2022.07.07 FTX Call Notes (3AC-FTX-00526790)	N/A				
25.	2022.07.12 Email from Christopher Daniel to Russell Crumpler attaching Asset List (3AC-FTX-00532488-506)	N/A				
26.	2022.07.13 Letter from Wong to Advocatus (3AC-FTX-00532507-10)	N/A				
27.	2022.07.14 Email chain between Bethel and Fay regarding letter to FTX attaching data (3AC-FTX-00526814-40)	N/A				
28.	2022.07.14 Email from Farmer to Sun attaching letter to FTX (3AC-FTX-00527062-65)	N/A				
29.	2022.07.14 Letter from Teneo to Davies and Zhu (3AC-FTX-00532514-15)	N/A				
30.	2022.07.15 Email from Advocatus to Wong attaching Revised Asset List (3AC-FTX-00532521-26)	N/A				
31.	2022.07.15 Email from Farmer to Davies and Zhu regarding liquidation (3AC-FTX-00532519-20)	N/A				
32.	2022.07.16 Email from Wong to Advocatus regarding liquidation (3AC-FTX-00532536-42)	N/A				

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>D.I.</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
33.	2022.07.19 Email from Farmer to Teneo team regarding FTX account (3AC-FTX-00526884-85)	N/A				
34.	2022.07.26 Email from Bethel to Farmer regarding letter to FTX (3AC-FTX-00524098-137)	N/A				
35.	2022.08.03 Letter from Advocatus to Wong (3AC-FTX-00532670-71)	N/A				
36.	2022.08.11 Call Transcript (3AC-FTX-00533014-20)	N/A				
37.	2022.08.12 Email from Wong to Advocatus, attaching Tether checklist for founders (3AC-FTX-00532688-709)	N/A				
38.	2022.09.07 Email from Advocatus to Wong, attaching final asset list (3AC-FTX-00531036-41)	N/A				
39.	2022.09.13 Email from Fay to Bethel regarding 3AC account history (3AC-FTX-00526886)	N/A				
40.	2022.09.16 Email from Bethel to Fay regarding 3AC account history attaching deposits and withdrawals data (3AC-FTX-00526888-91)	N/A				
41.	2022.09.26 Email from Fay to Bethel regarding 3AC account history, attaching withdrawals and deposits data (3AC-FTX-00526953-60)	N/A				
42.	2022.09.27 Email from Bethel to Fay regarding 3AC account history, attaching withdrawals and deposits data (3AC-FTX-00526961-68)	N/A				
43.	2022.09.30 Email from Farmer to Davies and Zhu regarding fireblocks request (3AC-FTX-00532886-88)	N/A				
44.	2022.10.10 Email from Fay to Bethel regarding 3AC account history, attaching withdrawals data (3AC-FTX-00526977-84)	N/A				
45.	2022.10.15 Singapore Summons (3AC-FTX-00524574-75)	N/A				

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46.	2022.10.15 Ninth Affidavit of Russell Crumpler (3AC-FTX-00524501-74)	N/A				
47.	2022.11.10 Email chain from Fay to Bethel regarding wallet identify request (3AC-FTX-00527028-35)	N/A				
48.	2022.11.17 Letter from Wong to Solitaire (3AC-FTX-00532906-12)	N/A				
49.	2022.11.30 Singapore Order (3AC-FTX-00524576-85)	N/A				
50.	2023.03.02 FTX Debtors' Shortfall Presentation	792				
51.	2023.06.30 Email between Latham & Watkins ("LW") to Sullivan & Cromwell ("S&C") regarding proof of claims	27901-5, Ex. 1				
52.	2023.09.25 Singapore Orders (3AC-FTX-00526304-07)	N/A				
53.	2023.10.10 Email between LW and S&C regarding the informal information sharing agreement between the 3AC Debtor and the FTX Debtors	27901-5, Ex. 2				
54.	2023.10.25 A&M Presentation (FTX_3AC_000013918-13939)	27755, Ex. 18				
55.	2023.10.27 Email from LW to S&C regarding document requests	27901-5, Ex. 3				
56.	2023.12.13 Zhu Transcript (3AC-FTX-00533487-723)	N/A				
57.	2024.02.07 Email from LW to S&C regarding produced documents	27901-5, Ex. 4				
58.	2024.03.08 Email from LW to S&C supplementing the February 7 requests with additional queries	27901-5, Ex. 5				
59.	2024.06.03 Email from LW to S&C regarding additional information requests	27901-5, Ex. 6				

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60.	2024.07.02 Email from LW to S&C regarding proposed discovery requests in advance of filing a motion for discovery pursuant to Bankruptcy Rule 2004	27901-5, Ex. 7				
61.	2024.07.10 Email from LW to S&C, attaching first set of request for production, interrogatories and 30(b)(6) deposition notice	27901-5, Ex. 8				
62.	2024.07.26 FTX's responses and objections to the 3AC Debtor's first set of discovery requests	27901-5, Ex. 9				
63.	2024.08.07 Email from LW to S&C regarding the second set of discovery requests	27901-6, Ex. 10				
64.	2024.08.28 FTX's responses and objections to discovery requests and 30(b)(6) deposition topic	27901-6, Ex. 11				
65.	2024.09.03 FTX's responses and objections to the 3AC Debtor's discovery requests	27901-6, Ex. 12				
66.	2024.09.03 Email from S&C to LW regarding 30(b)(6) deposition	27901-6, Ex. 13				
67.	2024.09.04 A&M Presentation (FTX_3AC_000013874-13911)	27755, Ex. 19				
68.	2024.09.04 A&M Presentation (FTX_3AC_000013874-13911) (unredacted version)	N/A				
69.	2024.09.20 Email from LW to S&C regarding documents following 30b6 deposition	27901-7, Ex. 15				
70.	2024.09.22 Email between LW and S&C regarding documents following 30b6 deposition	27901-7, Ex. 16				
71.	2024.10.04 Email from LW to S&C, attaching 3AC's draft amended POC	27901-9, Ex. 26				
72.	2024.10.10 Email between LW and S&C regarding documents following 30b6 deposition	27901-7, Ex. 17				
73.	2024.10.11 Email from LW to S&C regarding counsel information for relevant FTX personnel	27901-8, Ex. 22				



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74.	2024.10.17 Email from S&C to LW regarding relevant individuals information	27901-8, Ex. 21				
75.	2024.10.28 Email from LW to S&C regarding deposition of FTX employee	27901-8, Ex. 23				
76.	2024.11.01 Email from LW to S&C, attaching the fourth set of discovery requests	27901-8, Ex. 25				
77.	2024.11.04 Email from Fay to Farmer regarding 3AC account history (3AC-FTX-00527036-48)	N/A				
78.	2024.11.04 Email from S&C to LW regarding production	27901-8, Ex. 24				
79.	2024.11.08 Debtors' Responses and Objections to The Joint Liquidators of Three Arrows Capital, Ltd.'s (i) Third Set of Interrogatories and (ii) Third Set of Requests for The Production of Documents	N/A				
80.	2024.11.11 Notice of 30(b)(6) Deposition of Joint Liquidators	N/A				
81.	2024.11.18 The Joint Liquidators Objects to Notice of Deposition of Russell Crumpler	N/A				
82.	2024.11.18 Joint Liquidators' Responses and Objections to FTX 30(b)(6) Deposition Notice of 3AC	N/A				
83.	"Spot Margin Trading Explainer" (FTX_3AC_000013862-13873)	27901-8, Ex. 20				
84.	Slipsheet of Transaction Data Spreadsheet (FTX_3AC_000000002)	N/A				
85.	Daily Balance Spreadsheet (FTX_3AC_000000038)	N/A				
86.	Spot Margin Borrow Spreadsheet (FTX_3AC_000000008)	N/A				
87.	Robert Gordon LinkedIn Profile	N/A				
88.	Document titled "Lines of Credit on FTX" (undated) (FTX_3AC_000013689-94)	N/A				

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89.	FTX Exchange: Terms of Service (undated) (FTX_3AC_000013670-688)	N/A				
90.	May 2022 NAV Pack (3AC-FTX-00524002)	N/A				
91.	Line of Credit Spreadsheet (FTX_3AC_000000054)	N/A				
92.	FTX Website “Downloading Your Transaction History,” available at <a href="https://support.ftx.com/hc/en-us/articles/24862737408532-Downloading-Your-Transaction-History">https://support.ftx.com/hc/en-us/articles/24862737408532-Downloading-Your-Transaction-History</a>	N/A				
93.	Any rebuttal or impeachment exhibits					

### **RESERVATION OF RIGHTS**

The Joint Liquidators of the 3AC Debtor reserve their right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

*[intentionally left blank]*

Dated: December 10, 2024  
Wilmington, Delaware

**PASHMAN STEIN WALDER HAYDEN, P.C.**

/s/ Alexis R. Gambale

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